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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

JOSEPH W. MARTIN,

Plaintiff.

V.

Case No. 4:14-cv-804-JAR

UNITED COLLECTION BUREAU, INC.,

Defendant.

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** 

Pursuant to Federal Rule of Civil Procedure 56(c) and Local Rule 7-4.01(E), Defendant, United Collection Bureau, Inc., submits its Motion for Summary Judgment on Count I of the Complaint. The reasons in support of the Motion are set forth in full in the accompanying memorandum.

WHEREFORE, Defendant, United Collection Bureau, Inc., by counsel, respectfully requests that the Court grant its Motion for Summary Judgment and enter an Order dismissing Plaintiff's Complaint with prejudice, and granting United Collection Bureau, Inc. any further legal or equitable relief that the Court deems appropriate.

Dated: October 10, 2014 Respectfully submitted,

UNITED COLLECTION BUREAU, INC.

By: /s/ Danielle N. Twait

Danielle N. Twait, #60690MO TROUTMAN SANDERS LLP 55 W. Monroe St. #3000 Chicago, IL 60603 Case: 4:14-cv-00804-JAR Doc. #: 19 Filed: 10/10/14 Page: 2 of 3 PageID #: 119

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of October, 2014, I filed the foregoing via ECF filing and have also sent a copy via U.S. mail, addressed as follows:

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By:	/s/ Danielle N. Twait	
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